REMARKS

The enclosed is responsive to the Examiner's Office Action mailed on January 26, 2009. At the time the Examiner mailed the Office Action claims 1-6, 8-14, 16-20, 22, 23 and 25-32 were pending. By way of the present response the Applicants have: 1) amended claims 1, 9, 17, 27, 31 and 32; 2) added no new claims; and 3) canceled no claims. As such, claims 1-6, 7-14, 16-20, 22, 23 and 25-32 are now pending. The Applicants respectfully request reconsideration of the present application and the allowance of all claims now represented.

Claim Rejections

35 U.S.C. 103(a) Rejections

The Office Action rejected claims 1-6, 8-14, 16-20, 22-23 and 25-32 under 35 U.S.C. 103(a) as being unpatentable over Ahmavaara, et al., U.S. Publication No. 2005/0272465 (hereinafter "Ahmavaara") and further in view of Melpignano, U.S. Publication No. 2005/0176473 (hereinafter "Melpignano").

Ahmavaara describes a method for providing access ***from*** a WLAN network to a GPRS service. *See e.g.*, Ahmavaara , paragraphs [0016]-[0017] and [0024]-[0030]. As illustrated in annotated Figure 1 below, Ahmavaara describes a terminal device attempting to access a GPRS service through a WLAN. Specifically, the terminal device

> which is subscribed to a GPRS service and wishes to get access to the service, first transfers a service selection information indicating at least one APN parameter and an optional username and password via the WLAN 30 to an authentication server 50 of the GPRS network 70 by using an authentication signaling, e.g. an authorisation request message (1st step). (Ahmavaara , paragraph [0025].)
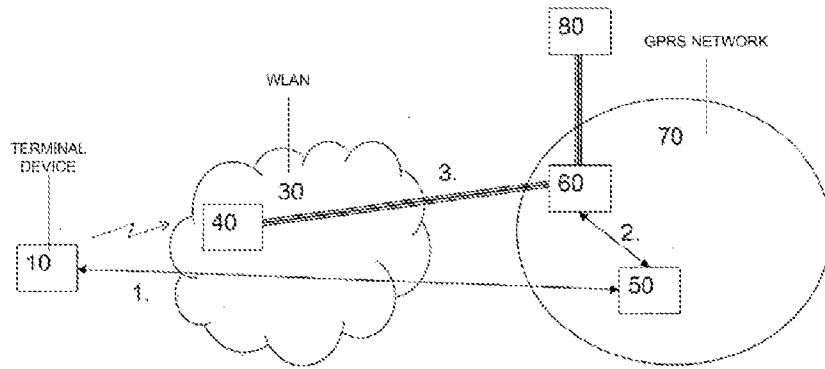
Fig. 1

As shown above, this means that the terminal device already has access to the WLAN. Figure 2 has a similar illustration.

Additionally, Ahmavaara 's Fig. 3 "shows a signaling diagram indicating an EAP-SIM authentication signaling between the UE 10 and the authentication server 50 of the GPRS network." (Ahmavaara , Fig. 3 and paragraph [0030].) Applicants note that in this figure there is no authentication made to a WLAN.

Melpignano describes a mobile device that can connect to the internet using WPAN, WLAN, GPRS, or 3G which is the extent of its relevance.

The combination of Ahmavaara and Melpignano does not describe what Applicants' claims require. With respect to claims 1 and 9, the combination does not describe:

> using credential information stored in a subscriber identity module (SIM) associated with a General Packet Radio Service (GPRS) adapter to authenticate access to a wireless local area network (WLAN), wherein an access to a GPRS network via the GPRS adapter is authenticated using the credential information, and communications with the SIM and the WLAN are carried out using extensible authentication protocol for subscriber identity module (EAP-SIM).

Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via GPRS network. *See e.g.*, Ahmavaara , paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3.   Accordingly, Ahmavaara does not describe using credential information stored in a subscriber identity module (SIM) associated with a General Packet Radio Service (GPRS) adapter to authenticate access to a wireless local area network (WLAN). In Ahmavaara , a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed). None of the paragraphs cited by the Office Action describe Ahmavaara authenticating access to a WLAN much less doing so using credentials stored in a SIM associated with a GPRS adapter. Looking at Fig. 3 as an example, Ahmavaara describes attempting to access a GPRS network via a WLAN and not accessing a WLAN using SIM information associated with a GPRS adapter.

TERMINAL
DEVICE

AUTHENTICATION
SERVER OF THE
GPRS NETWORK

10   50

1. EAP: Identity Response

- Pseudonym or IMSI, Nonce

2. EAP: Request

- NxRAND, etc.

3. EAP: Response

- SRES, etc. Encrypted APN parameters (APN, usrname, password)
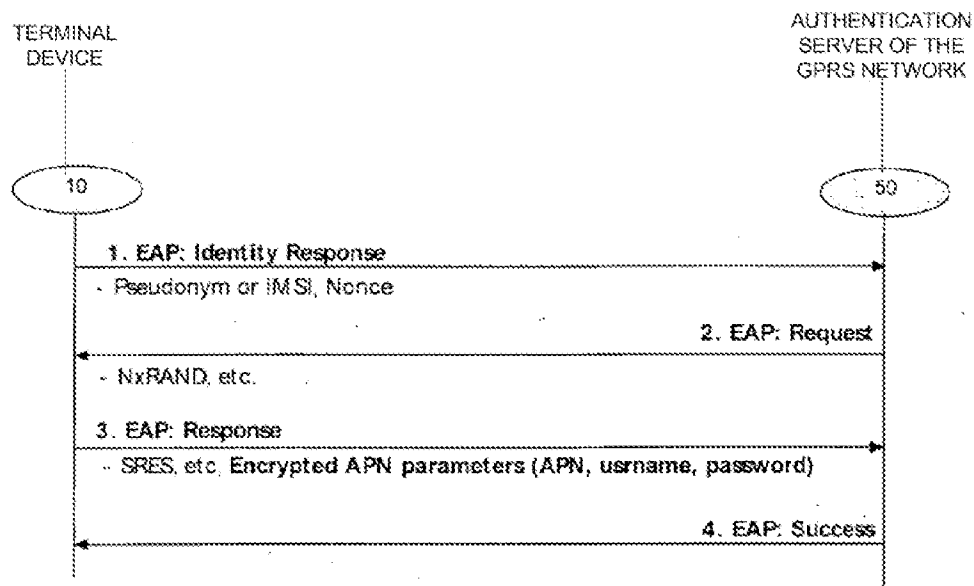
4. EAP: Success

Fig. 3

This is further reinforced by Ahmavaara 's discussion of the WLAN which states that "the WLAN 30 comprises a WLAN access server 40 for establishing a connection to external networks such as a GPRS network 70 or another packet-switched network 90, e.g. the Internet or an operator or company Internet."

(Ahmavaara , paragraph [0027].) And by Ahmavaara 's statement in the summary of "[t]hereby, access to network services of third parties is possible over the first network, e.g., the WLAN." (Ahmavaara , paragraph [0016].)

Simply put, Ahmavaara describes accessing a GPRS service via a WLAN, but does not describe "using credential information stored in a subscriber identity module (SIM) associated with a General Packet Radio Service (GPRS) adapter to authenticate access to a wireless local area network (WLAN)." Melpignano does not describe this clause either.

Thus, the combination of Ahmavaara and Melpignano does not describe what Applicants' claims 1 and 9 require. Claims 2-6 and 8 are dependent on claim 1 and are allowable for at least the same rationale. Claims 10-14 and 16 are dependent on claim 9 and are allowable for at least the same rationale.

With respect to claim 17, the combination does not describe:

> A system, comprising:
> a wireless local area network (WLAN) adapter;
> a general packet radio service (GPRS) adapter coupled to the WLAN adapter and including a subscriber identity module (SIM); and
> a mobility client to initiate requests for credential information from the SIM to authenticate access to a WLAN when the mobility recognizes an access point, wherein an access to a GPRS network via the GPRS adapter is authenticated using the credential information, and said requests for the credential information are communicated to the SIM using extensible authentication protocol for subscriber identity module (EAP-SIM).

As discussed above, Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via a GPRS network. *See e.g.*, Ahmavaara , paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3.   Accordingly, Ahmavaara does not describe "a mobility client to initiate requests for credential

information from the SIM to authenticate access to a new WLAN when the mobility recognizes an access point." In Ahmavaara , a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed). Melpignano does not describe this clause either.

Thus, combination does not describe what Applicants' claim 17 requires. Claims 18-20, 22-23, and 25-26 are dependent on claim 17 and are allowable for at least the same rationale.

With respect to claim 27, the combination does not describe:

> A system, comprising:
> means for initiating requests for credential information from a subscriber identity module (SIM) associated with a general packet radio service (GPRS) adapter, wherein a GPRS connection via the GPRS adapter is authenticated using the credential information;
> means for utilizing the credential information to authenticate access to a new wireless local area network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM); and
> means for switching data services from the GPRS connection to a WLAN connection after the access to the WLAN is authenticated.

As discussed above, Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via a GPRS network. *See e.g.*, Ahmavaara , paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3. Accordingly, Ahmavaara does not describe "means for utilizing the credential information to authenticate access to a new wireless local area network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM)." In Ahmavaara , a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed). Melpignano does not describe this clause either.

Additionally, Ahmavaara does not describe switching data services. In Ahmavaara a UE has both a WLAN and GPRS connection. *See e.g.*, Ahmavaara, Figures 1-2. At no point is the GPRS connection closed because if it did there would be no way for the UE to access the GPRS service via a LAN. *Id.* Thus, Ahmavaara also does not describe "means for switching data services from the GPRS connection to a WLAN connection after the access to the WLAN is authenticated."

Thus, combination does not describe what Applicants' claim 27 requires. Claims 28-30 are dependent on claim 27 and are allowable for at least the same rationale.

With respect to claims 31 and 32, the combination does not describe:

> issuing one or more requests to a Subscriber Identity Module (SIM) associated with a General Packet Radio Service (GPRS) adapter using Extensible Authentication Protocol (EAP), wherein a GPRS connection via the GPRS adapter is authenticated using credential information stored in the SIM;
> arbitrating the one or more requests to the SIM when the SIM is busy;
> receiving the credential information stored in the SIM via a SIM reader driver;
> <u>utilizing the credential information to authenticate access to a new Wireless Local Area Network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM)</u>;
> establishing a WLAN connection with the WLAN via a WLAN adapter;
> <u>issuing a location update to switch data services from the GRPS connection to the WLAN connection</u>; and
> <u>disconnecting from the GPRS connection</u>.

As discussed above, Ahmavaara describes an user equipment (UE) device that is connected to a WLAN gaining access to GPRS services (or other packet-switched services) via a GPRS network. *See e.g.*, Ahmavaara, paragraphs [0016]-[0017], [0024]-[0030], and [0034] and Figures 1-3. Accordingly, Ahmavaara

does not describe "utilizing the credential information to authenticate access to a new Wireless Local Area Network (WLAN) using extensible authentication protocol for subscriber identity module (EAP-SIM)." In Ahmavaara , a WLAN connection is already established and connection to GPRS services via the WLAN is made (the opposite of what is claimed). Melpignano does not describe this clause either.

Additionally, Ahmavaara does not describe "issuing a location update to switch data services from the GRPS connection to the WLAN connection" or "disconnecting from the GPRS connection." In Ahmavaara a UE has both a WLAN and GPRS connection. *See e.g.*, Ahmavaara , Figures 1-2. At no point is the GPRS connection closed because if it did there would be no way for the UE to access the GPRS service via a LAN. *Id.* Thus, Ahmavaara also does not describe "means for switching data services from the GPRS connection to a WLAN connection after the access to the WLAN is authenticated."

Thus, the combination does not describe what Applicants' claims 31 and 32 require.

CONCLUSION

Applicants respectfully submit that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Dave Nicholson at (408) 720-8300.

Respectfully submitted,

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